

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

IQVIA HOLDINGS INC.,

and

PROPEL MEDIA, INC.

Defendants.

Case No.: 1-23-cv-06188-ER

**REDACTED VERSION OF  
DOCUMENT SOUGHT TO BE  
SEALED**

**DECLARATION OF ANJELICA SARMIENTO IN SUPPORT OF MOTION FOR  
TEMPORARY RESTRAINING ORDER**

I, Anjelica Sarmiento, an attorney acting on behalf of the United States government, declares the following is true and correct under penalty of perjury.

1. I am an attorney in the Federal Trade Commission's Bureau of Competition and counsel for Plaintiff Federal Trade Commission in the above-captioned matter. I have personal knowledge of the facts set forth in this Declaration. I submit this Declaration in support of the Federal Trade Commission's Motion for Temporary Restraining Order.
2. Attached to this declaration and identified in the index below as **Doc. Nos. 2-3, 6-10, 12-13** are true and correct copies of declarations and testimony provided by and designated as confidential by third parties during the Federal Trade Commission's investigation of the proposed Acquisition of Propel Media, Inc. ("PMI") by IQVIA Holdings Inc. ("IQVIA").

3. Attached to this declaration and identified in the index below as **Doc. Nos. 1, 4-5, 14-35** are true and correct copies of documents and testimony provided by and designated as confidential by Defendant IQVIA Holdings Inc. during the Federal Trade Commission's investigation of the proposed Acquisition of PMI by IQVIA.
4. Attached to this declaration and identified in the index below as **Doc. Nos. 11, 37-55** are true and correct copies of documents and testimony provided by and designated as confidential by Defendant Propel Media, Inc. during the Federal Trade Commission's investigation of the proposed Acquisition of PMI by IQVIA.
5. Attached to this declaration and identified in the index below as **Doc. No 36** is a true and correct copy of IQVIA Holdings Inc., Annual Report (F10-K) (Feb. 15, 2023).
6. Attached to this declaration and identified in the index below as **Doc. No. 55** is a true and correct copy of a Blog Post by Anton Yazovskiy entitled *DeepIntent Deep Dive: What Is a Healthcare DSP?* (Sept. 01, 2022).
7. Attached to this declaration and identified in the index below as **Doc. No. 56** is a true and correct copy of an Article from Martech Series Marketing Technology Insights by Chris Paquette entitled *How COVID-19 Has Coronated Digital the King of Healthcare Marketing* (Oct. 28, 2020).

## EXHIBIT INDEX

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36	PX1137	IQVIA Holdings Inc., Annual Report (F10-K) (Feb. 15, 2023)	Publicly Available


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55	PX2582	Blog Post: Anton Yazovskiy, <i>DeepIntent Deep Dive: What Is a Healthcare DSP?</i> (Sept. 01, 2022)	Publicly Available
56	PX4002	Article: Martech Series Marketing Technology Insights, Chris Paquette, <i>How COVID-19 Has Coronated Digital the King of Healthcare Marketing</i> (Oct. 28, 2020)	Publicly Available

Pursuant to 28 U.S.C. § 1746, I state under penalty of perjury that the foregoing is true and correct.

Dated: July 17, 2023

Respectfully submitted,

  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 17, 2023, I electronically filed a true and correct copy of the foregoing document using the United States District Court for the Southern District of New York CM/ECF System.


I FURTHER CERTIFY that I served the foregoing document on the following counsel via electronic mail:

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